

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

OLES ENVELOPE, LLC, <u>et al.</u> ,	*	
Plaintiffs,	*	
v.	*	
GTD COMPANY, INC., <u>et al.</u> ,	*	Civil Action No. WMN 02-2017
Defendants.	*	
* * * * * *	*	* * * * *

PLAINTIFFS' TRIAL EXHIBIT LIST

Plaintiffs and Counterclaim Defendants, Oles Envelope, LLC and Oles Envelope Corporation, hereby submit this list of trial exhibits. Paper copies of the exhibits listed below will be filed with the Clerk of the Court prior to the trial.

<u>Trial Exhibit #</u>	<u>Depo Exhibit #</u>	<u>Bates #</u>	<u>Description</u>
1	Robinson 33	OLES G 967 OLES F 29 - 30	Communication Concepts check
2	Oechsle 18	OLES G 969 OLES F 31 - 32	Shubert Communications check
3	Oechsle 19	OLES G 970 OLES F 33	Packard Press check
4		OLES F 34 OLES F 186 - 190	Alcom check
5	Oechsle 12	OLES G 973 OLES F 35 - 36	Independence Health check
6	Oechsle 13	OLES G 974 OLES F 35 - 37	Independence Health check

7	Oechsle 13	OLES G 976 OLES F 38 - 39	PA State Emp. Credit Union check
8	Robinson 18	WTB 3032 WTB 3035 - 3036	FBK Group check
9	Robinson 19	WTB 3032 WTB 3037 - 3038	GK Printing check
10	Robinson 20	WTB 3039 WTB 3040 - 3041	TV Guide check
11	Robinson 21	WTB 3039 WTB 3042 - 3043	Fiserv check
12	Robinson 21	WTB 3039 WTB 3042 - 3043	Communications Graphics check
13	Robinson 22	WTB 3039 WTB 3050 - 3051	Keystone Financial check
14	Robinson 23	WTB 3039 WTB 3052 - 3053	Wyeth-Ayerst check
15	Robinson 23	WTB 3039 WTB 3052 - 3053	Wolfgang Candy check
16	Robinson 24	WTB 3056 WTB 3059 - 3060	Donegal check
17	Oechsle 1	WTB 2995 WTB 2996 - 2997	Lynx Graphics check
18	Oechsle 1	WTB 2995 WTB 2996 - 2997	Lynx Graphics check
19	Robinson 26	WTB 2995 WTB 2998 - 2999	Lynx Graphics check
20	Robinson 27	WTB 3008 WTB 3009 - 3010	GK Printing check
21	Robinson 28	WTB 3016 WTB 3017 - 3018	Bentley Graphics check

22	Robinson 29	WTB 3019 WTB 3022 - 3023	Vincent Varollo check
23	Robinson 29	WTB 3019 WTB 3022 - 3023	Robert E. Lorenson check
24	Robinson 29	WTB 3019 WTB 3022 - 3023	US Recycling check
25	Robinson 30	WTB 3019 WTB 3028 - 3029	Precision Forms & Graphics check
26	Robinson 31	WTB 3648 WTB 3712	Closed Ro Envelope Account check
27	Oechsle 16 Robinson 32	WTB 1057 WTB 1074 OLES G 918	PA State Emp. Credit Union check
28	Oechsle 4	RMB 5 RMB 16 - 18 OLES G 1631	GK Printing check
29		RMB 12 - 15	Communication Concepts check
30		RMB 12 - 15 OLES F 81 - 86	Tursack check
31	Oechsle 3	RMB 5 RMB 9 - 11 OLES G 1634	National Collection Services check
32		RMB 431 - 433	Ro X Bogus deposit
33		RMB 458 - 461	International Envelope Co. check
34	Robinson 34	RMB 251 - 271 OLES F 242 - 243 OLES G 913	Five Thousand Forms check
35	Oechsle 8	RMB 477 - 478 RMB 479 - 480	QVC check
36	Oechsle 8	RMB 477 - 478 RMB 481 OLES F 239 - 241	Vanguard check
37		RMB 487 - 490	Shubert Communications check

38		RMB 487 - 492	Great Atlantic Graphics check
39	Oechsle 6	RMB 241 - 271 OLES G 1132	Fiserv check
40	Oechsle 5	RMB 251 - 217 OLES G 1171 OLES F 248 - 253	TV Guide check
41	Oechsle 7	RMB 251 - 271 OLES G 1145	Educational Testing Services check
42		OLES G 45	Pica check
43	Moderacki 11	H112	Improper Expenses Spreadsheet
44	Oechsle 32	OLES C 1 - 50	2/14/01 Expense Points with backup
45		OLES E 431 - 679	Credit card information
46		OLES E 390 - 430	Special Account spreadsheet
47		OLES E 1 -268	Cash receipts
48	Robinson 1	OLES A 320 - 352	Ro Customer List included in Asset Purchase Agreement
49	Robinson 4	OLES A 415	9/30/99 Delivery agreement between Ro X and Ro LLC
50	Robinson 6		signature card WTB 40026656656 (Ro LLC. Operating Account)
51	Robinson 7	RMB 246 - 250	signature card and account information WTB 40027668046 (Ro X Operating Account)
52	Robinson 8	RMB 28	signature card WTB 40027668054 (Ro X PR Account)
53	Robinson 9	RMB 1 OLES G 22 - 30	signature card and statements WTB 40013346739 (GTD)
54	Robinson 10	OLES G 12 - 14 OLES G 18 - 19	signature card and account information First Union 3303304 (Ro X BOGUS)

55	Robinson 11	RMB 739 RMB 768 - 69 RMB 772 RMB 774	signature card WTB 400135851 (Robinson Personal Account)
56	Robinson 13	No Bates	signature card WTB 40026656664 (Ro LLC PR Account)
57	Robinson 14	WTB 1152 WTB 1237	\$10,000 deposit into Robinson personal account (40026655641) from GTD
58	Robinson 12	RMB 871 - 874	signature card and computer screen printouts WTB 40026655641 (Robinson Personal Account)
59	Robinson 35	No Bates	Checks from RITE to Ro X
60	Robinson 39	Missing Exhibit***	RITE payment to Robinson for freight
61	Robinson 40	OLES E 347 - 348	2/1/00 Letter from Jay Young
62	Robinson 41	DEF 225 - 229 OLES G 898 DEF 203	Notice of Levy on RO X RMB accounts Legible copies of IRS checks
63	Robinson 42	OLES B 4 - 5	5/15/01 Early Retirement Letter from Oles to Robinson
64	Robinson 43	OLES B 8	3/1/01 Letter from Oles to Oechsle re: resignation
65	Robinson 44	RMB 8	2000 GTD checks to Robinson (2) 2000 GTD checks to Ro (2)
66	Oechsle 1	WTB 2995 WTB 3004 - 3007	\$10,000 from GTD to Oechsle \$10,000 from GTD to Robinson
67	Oechsle 2	OLES G 435	6/18/01 Oechsle Letter to Detective Owen
68	Oechsle 10	WTB 197 - 198 WTB 298 WTB 793 - 794 WTB 857 WTB 875 - 876 WTB 942 - 943 WTB 948 - 49	\$2,500 Loan from Oechsle to Ro X \$1,000 Loan from Oechsle to Ro X \$1,000 Loan from Oechsle to Ro X \$2,000 Loan from Oechsle to Ro X

		WTB 952 - 53	\$2,500 Loan from Oechsle to Ro X
69	Oechsle 11	WTB 3571 - 3572 WTB 3626	\$1,400 from GTD to RoX
70	Oechsle 12	WTB 3921 - 3923 WTB 3986 - 3987	\$1,000 from GTD to Oechsle
71	Oechsle 15	NA (2 documents)	3/5/03 restitution payment to Oles by Chester County Restitution
72	Oechsle 21	RMB 1 - 27	GTD signature card, account information, amounts paid out of GTD
73	Oechsle 22	WTB 3056 WTB 3061	\$890 payment from GTD for Oechsle's AmEx card
74	Oechsle 23	DEF O 1608 - 1611	RO X Sales Report, Aging 3/31/00
75	Oechsle 24	DEF O 2438 - 2441	RO X Open Invoices 11/00
76	Oechsle 25	WTB 1507 - 1508 WTB 1561 - 1562	\$2,000 from GTD to Ro X
77	Oechsle 26	RMB 645 RMB 656	Signature Card for Money Market Account held by Oechsle and Mom Oechsle borrowed \$\$ from Mom for RO X
78	Oechsle 27	DEF O 2588 - 2611	1999 RO X Tax Returns
79	Oechsle 28	DEF O 2612 - 2632	2000 RO X Tax Returns
80	Oechsle 29	DEF O 2633 - 2659	2001 RO X Tax Returns
81	Oechsle 31	OLES B 9	Oechsle's Resignation Letter
82	Oechsle 33 O'Brien 6	OLES M 1 - 71	RO X Job Jackets + Trucking Logs
83	O'Brien 2	OLES G 424-428	O'Brien's Proffer Statement to Detective Owen
84	O'Brien 6 Oechsle 33	OLES M 1 - 71	Ro X Shipping Schedules (Invoices to Oles) Ro Env Job Jackets
85	Owen 1		Subpoena, Deposition Notice – Owen
86	Owen 2	OLES G 380 - 410	Detective Owen's report

87	Owen 3	OLES G 424 - 428	Joseph O'Brien's Proffer Statement
88	Owen 4	OLES G 1682 - 83 OLES G 1674 OLES G 932 - 62	backup received from Tursack, Bentley and US Recycling re: alleged freight charges
89	Owen 5	OLES G 429 - 432	Harold Robinson's written statements
90	Owen 6	OLES G 433 - 435	David Oechsle's written statements
91	Owen 7	OLES G 963 - 65 OLES G 977 - 1006 OLES G 1022 - 23 OLES G 1026 - 36	documents obtained from First Union in response to Search Warrant re: Bogus account
92	Moderacki 3	OLES F 408 - 423 OLES F 255 - 423	ACCPAC invoice listing
93	Moderacki 4	OLES G 6	
94	Moderacki 6	OLES F 16	Spreadsheet - Funds in & out of RO X - \$74,413.70
95	Moderacki 7	OLES D 15	Spreadsheet - Misappropriated Funds (into BOGUS & GTD) - \$99,751.29
96	Moderacki 8	OLES F 19	Spreadsheet - demonstrates how RO X's repayments were credited to RO A/R
97	Moderacki 9	OLES G 6	Steve Swartz's spreadsheet re: A/R Adjustments & Missing Sales
98	Moderacki 10	OLES G 4 - 5	List of all diverted funds
99	Moderacki 11	OLES H 112	Spreadsheet of Oechsle's improper expenses
100	Moderacki 14	OLES B 11 - 22	Notes for meeting with Oechsle
101	Moderacki 15	OLES C 23	List of Oechsle's monthly gas charges during 2000
102	Moderacki 16	OLES B 6 - 7	S. Stacharowski's notes re: meeting with Oechsle about expenses, resignation

103	Moderacki 17	OLES D 11	9/27/01 Letter from M. Moderacki to Oechsle re: 2001 payment less deductions
104	Moderacki 21	OLES G 2	M. Moderacki's 6/13/01 Letter to Detective Owen
105	Moderacki 22	OLES G 3	M. Moderacki's 9/12/01 letter to Detective Owen
106	Moderacki 23	OLES G 7 - 10	M. Moderacki's notes re: diversions into GTD
107	Moderacki 24	OLES G 11 - 15	Details re: diversions into various accounts
108	Moderacki 25	OLES G 16 - 21	Bank account detail - #27668046 (8/25/00 - 1/22/01)
109	Moderacki 25A	OLES H 7 - 22	Oles Audit Report 9/26/99 & 9/27/98
110	Moderacki 26	OLES H 23 - 38	Oles CONSOLIDATED Audit Report - 9/30/01 & 9/24/00
111	Moderacki 29	OLES H 56 - 57	Ro LLC financials 9/01
112	N/A	OLES H 39 - 40	Ro LLC Financials 9/00
113	Moderacki 30	OLES F 72 - 78.5	ACCPAC Adjustments & Credit Notes
114	Moderacki 31	OLES F 424 - 427	Examples of credit notes where payment made by customer
115		OLES A 1 - 416	Closing Binder
116	Signorelli 1		Ro Env Original Valuation Forecast based on historical numbers thru 10/1/99
117	Signorelli 2	OLES K 2 - 5	9/23/99 Proforma/projections prepared in support of \$2,000,000 purchase price
118	Signorelli 3	OLES K 6 - 11	4/29/99 Proforma/projections prepared in support of \$2,000,000 purchase price
119	Signorelli 4		Signorelli's 10/11/02 Report
120	Signorelli 5		Signorelli's 6/6/03
121	Signorelli 6		EMA 10/01 Volume & Orders Report
122	Signorelli 7		EMA 8/02 Volume & Orders Report

123	Signorelli 8		6/4/03 listing of Cash Outlays paid by Oles on behalf of Ro
124	Signorelli 9		worksheet for cash outlays listing (Exhibit 8)
125	Signorelli 10		Signorelli's handwritten notes from meeting with Mark Moderacki
126	Signorelli 11		8/30/02 Engagement Letter from Signorelli to W. Coe
127	Signorelli 12		EMA - Index re: units in dollars (from EMA website)
128	Signorelli 13		Details for Signorelli's underlying calculators
129	Signorelli 14		Signorelli's handwritten notes from meeting with Mark Moderacki
130	Signorelli 15		Schedule of Oles' bank and legal fees
131	Signorelli 16	OLES K 1 - 406	Larry Signorelli's entire file
132	Stacharowski 3	OLES 358 - 360	2/1/01 Meeting Notes
133	Young 7	OLES E 347 - 348	2/1/00 Memo from J. Young
134	Young 8	OLES E 349 - 350	2/3/00 Memo form L. Henrich
135	Young 9	OLES E 344	12/8/00 Memo
136	Young 10	OLES E 343	12/5/00 Letter re: Ro X deliveries
137	Young 11	OLES 345	12/21/00 J. Young email

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of March, 2004, a copy of Plaintiffs' Trial Exhibit List and trial exhibits were hand-delivered to:

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